

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

SOLID WASTE AGENCY OF NORTHERN COOK COUNTY)	
)	
Plaintiff,)	Case No.: 1:11-cv-04373
)	
v.)	Honorable Matthew Kennelly
)	
CHRISTOPHER BROOKE BEAL,)	Magistrate Judge Sheila Finnegan
)	
Defendant.)	

AGREED MOTION TO ENTER CONSENT JUDGMENT

Plaintiff Solid Waste Agency of Northern Cook County ("SWANCC"), and Defendant Christopher Brooke Beal, by and through their attorneys of record, hereby submit this Agreed Motion to Enter Consent Judgment pursuant to Fed. R. Civ. P. 58(d). In support of its motion, the parties state as follows:

1. On November 15, 2012 the parties signed a stipulation whereby Defendant Christopher Brook Beal stipulated to all liability on all claims asserted in the Complaint. Defendant further stipulated to the damages incurred by SWANCC as a result of his conduct in the amount of \$850,000.00 including compensatory and punitive damages, attorney's fees and costs. *See Exhibit A, Stipulation and Order*

2. Based upon the parties' stipulation, the parties have agreed and hereby by request that the Court enter a consent judgment in Plaintiff's favor on all claims and in the amount of \$850,000.00. The parties have attached an order for the Court's signature

WHEREFORE, the parties respectfully request that the Court grant the Motion to

Enter Consent Judgment and enter judgment on behalf of Plaintiff Solid Waste Agency of Northern Cook County and against Defendant Christopher Brooke Beal.

Respectfully submitted,

**SOLID WASTE AGENCY OF NORTHERN
COOK COUNTY**

CHRISTOPHER BROOKE BEAL

By _____
One of Its Attorneys

By _____
His Attorney

Robert J. Smith, Jr. (rsmith@cbslawyers.com)
Yvette Heintzelman
(yheintzelman@cbslawyers.com)
Sheldon Leigh Jeter (ljeter@cbslawyers.com)
Benjamin E. Gehrt (bgehart@cbslawyers.com)
CLARK BAIRD SMITH LLP
6133 North River Road, Suite 1120
Rosemont, Illinois 60018
Ph: (847) 378-7700
Fx: (847) 378-7070

Thomas M. Breen (tbreen@defend-chicago.com)
BREEN PUGH & ASSOCIATES
50 West Jackson Boulevard
Suite 1460
Chicago, IL 60604
Ph: (312) 360-1001